

EPA Reg. No. 53883-214

Material to be added to an e-Jacket/Jacket

Reg. No. 53883-214

Description: Agency letter 8/23/10, new Basic CSF dated 8/19/10, email from registrant 8/19/10, note to file, Agency letter 5/25/10, registrant letter 4/26/10, form 8570-1 4/26/10, form 8570-27 4/7/10, email from registrant 4/26/10, Agency letter 4/19/10, registrant letter 4/7/10, form 8570-1 4/7/10

1. ☒ Placement within the e-Jacket/jacket:
- ☒ Default: (chronological, top = newest)
 - ☐ File Location: (PDF page number, i.e., "before page 45")
- default = top is newest
-
-

2. ☒ Send to Data Extraction contractors this material:
- ☐ Newly stamped accepted label
 - ☐ Notification
 - ☒ New CSF
 - ☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Marianne Lewis

Phone: 703-308-8043 Division: RD/IRB

Date: 8/23/10

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

August 23, 2010

Anne Turnbough
Regulatory Manager
Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

Subject: Amended Basic CSF to update source
CSF dated August 19, 2010
IMI Tech
EPA Registration No. 53883-214

Dear Ms. Turnbough:

The amended CSF referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable. A copy has been placed on file. Please note that the Basic dated 8/19/10 will supersede all previous formulations on file. If you have any questions, please contact Marianne Lewis by phone at: (703) 308-8043, or by email at: lewis.marianne@epa.gov.

Regards,

A handwritten signature in black ink, appearing to read "Venus Eagle", with a long horizontal flourish extending to the right.

Venus Eagle
Insecticide-Rodenticide Branch
Registration Division (7505P)

FIFRA

CONFIDENTIAL BUSINESS INFORMATION DOES NOT CONTAIN NATIONAL SECURITY INFORMATION (EO 12958)

SOME INFORMATION IN THE ATTACHED MATERIAL MAY BE EXEMPTED FROM FIFRA UNDER A TRADE SECRET OR PROPRIETARY DATA UNDER SECTION 7(b) AND 10(b) OF FIFRA AND INSECTICIDE FUNGICIDE AND RODENTICIDE ACT (FIFRA) AS AMENDED.

ANY PERSON HANDLING OR USING THE ATTACHED DATA IN ANY WAY IS RESPONSIBLE FOR PREVENTING UNAUTHORIZED DISCLOSURE WHILE IN HIS POSSESSION. SECTION 10(b)(1) MAKES IT UNLAWFUL FOR ANY CONFIDENTIAL INFORMATION (EXCEPT TO PERSONNEL NEEDING THE INFORMATION FOR THE PERFORMANCE OF OFFICIAL DUTIES). A PENALTY OF UP TO \$10,000 FINE AND UP TO 3 YEARS IMPRISONMENT MAY RESULT FROM CONVICTION OF A VIOLATION OF SECTION 12(a)(1)(D).

SECTION 10(b) MAKES IT A CRIME FOR EMPLOYEE TO DISCLOSE CONFIDENTIAL INFORMATION EXCEPT AS AUTHORIZED BY SECTION 7 AND 10 OF FIFRA. A PENALTY OF UP TO \$10,000 FINE AND UP TO ONE YEAR IN JAIL MAY RESULT FROM CONVICTION OF A VIOLATION OF SECTION 10(b).

THE ATTACHED INFORMATION IS NOT TO BE PUBLISHED, REPRODUCED, PUBLICLY DISCUSSED, OR INCLUDED IN RESPONSE TO A FREEDOM OF INFORMATION REQUEST (FOIA) REQUEST OR OTHERWISE RELEASED WITHOUT THE EXPLICIT WRITTEN AUTHORIZATION OF THE APPROPRIATE DIVISION DIRECTOR OR HIS DESIGNEE.

53883-214/ CSI Imi Tech
Anne Turnbough
to:
Marianne Lewis
08/19/2010 05:00 PM
Cc:
Anne Turnbough
Show Details

Marianne,

As a follow up to your call today regarding my request to add source to CSF for the Imi Tech on file/ 53883-214. As noted [REDACTED] is no longer supporting the 99% Tech material and therefore the attached CSF is revised as the basic to reflect only the 98% material .

Please let me know if you and/ or Venus needs any additional paperwork other than documents attached.

Sincerely,

Anne

Anne Turnbough Ph.D.
Regulatory Manager
Control Solutions, Inc.
A Makhteshim-Agan Company
Office: 281.892.2532
Cell: 713.851.6076

Product ingredient source information may be entitled to confidential treatment

Note to File:

4/7/10 Registrant initially submitted an alternate CSF citing the wrong a.i.

4/26/10 registrant resubmitted alternate CSF with correct a.i. but basic and alternates are both 100% repacks of separate products

7/10 the product listed on Basic CSF cancelled

8/19 registrant resubmitted new Basic with no alternates

ML
8/23/10

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 25, 2010

Anne Turnbough
Manager, Regulatory Affairs
Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

Subject: IMI Tech
EPA Reg. No. 53883-214
Notification Application Dated April 26, 2010

Dear Ms. Turnbough:

The Agency has received your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 and 40 CFR 152.46, dated April 26, 2010, for the product IMI Tech, EPA Reg. No. 53883-214. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and 40 CFR 152.46 and finds that the action requested does not clearly fall within the scope of PR Notices 98-10 and 40 CFR 152.46 and will require additional administrative review of the related files.

Therefore, RD has determined that this action is denied and has been forwarded to Venus Eagle, PM 01 for further processing as an amendment. If you have any questions, please call me directly at (703) 308-8043 or email lewis.marianne@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Marianne Lewis".

Marianne Lewis
Insecticide-Rodenticide Branch
Registration Division (7505P)

CSI
CONTROL
SOLUTIONS
incorporated

April 26, 2010

Linda Arrington, Team Leader, Notifications & Minor Formulation
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Document Processing Desk (NOTIF)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Subject: Notification per PR Notice 98-10 to update the IMI Tech
EPA Registration No. 53883-214

Dear Ms. Arrington:

Control Solutions Inc. (CSI, EPA Company Number 53883-) is submitting a notification per PR Notice 98-10 to make revisions to the Confidential Statement of Formula (CSF) for IMI Tech. The following items are enclosed in support of this notification:

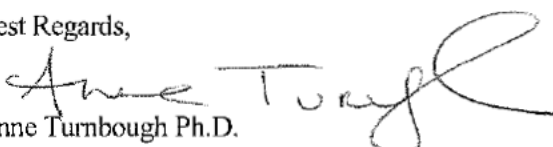
- (1) Application for Pesticide Form (8570-1)
- (2) Revised Confidential Statement of Formula (two copies)
- (3) Formulator's Exemption Statement Form (8570-27)

CSI has been informed that [REDACTED] intends to transition supply of the current Imidacloprid 99% active [REDACTED] to [REDACTED]. The new source of Imidacloprid indicated on the CSF is an EPA registered source. No other changes to the CSF have been made.

"This notification is consistent with provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

If you have any questions or need additional information, please do not hesitate to contact me at 281-892-2532.

Best Regards,


Anne Turnbough Ph.D.
Manager, Regulatory Affairs



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 53883 - 214	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IMI Tech	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507-1041 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

The revisions to the CSF consist of updating the list of alternate suppliers for the active ingredient Imidacloprid. An alternative CSF has been submitted to reflect change in supplier. Each of the new sources of Imidacloprid indicated on the CSF are EPA registered sources. No other changes to the CSF have been made.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container		<input checked="" type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 55 kg		5. Location of Label Directions <input checked="" type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Anne Turnbough		Title Manager, Regulatory Affairs		Telephone No. (Include Area Code) 800-242-2532	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Manager, Regulatory Affairs			
4. Typed Name Anne Turnbough		5. Date 04-26-10			



United States

Environmental Protection Agency

Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

EPA File Symbol/Registration Number

53883 - 214

Product Name

(M! Tech

Date of Confidential Statement of Formula (EPA Form 8570-4)

4-7-10

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

imidacloprid

'2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:

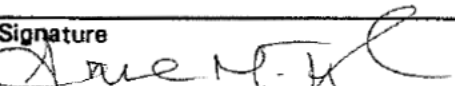
☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Imidacloprid		
Signature 	Name and Title Anne Turnbough-Manager, Regulatory Affairs	Date 4-7-10

Product ingredient source information may be entitled to confidential treatment

Imidacloprid Technical/ 53883-214

Anne Turnbough

to:

Marianne Lewis

04/26/2010 10:07 AM

Cc:

Anne Turnbough

Show Details

Hi Marianne,

I am following up on a response letter and voicemail pertaining to a notification related to Control Solution's product (CSI) Imidacloprid Tehnical 53883-214).

I just noted an error on the cover letter sent to you 4/7/2010- The letter referenced transition to [REDACTED], which is correct and is a 2,4-D, however what I had intended and my mistake is transition to [REDACTED] which is another source of Imidacloprid technical.

The CSF is accurate as noted in attached.

Can you please advise if you need me to resubmit a new cover letter and / or notification to correct accordingly.

I apologize for the inconvenience,

Sincerely,

Anne Turnbough

Anne Turnbough

Regulatory Manager

Control Solutions, Inc.

A Makhteshim-Agan Company

Office: 281.892.2532

Cell: 713.851.6076

Product ingredient source information may be entitled to confidential treatment

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
PREVENTION, PESTICIDES,
AND TOXIC SUBSTANCES

April 19, 2010

Anne Turnbough
Manager, Regulatory Affairs
Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

Subject: IMI Tech
EPA Reg. No. 53883-214
Notification Application Dated April 7, 2010

Dear Ms. Turnbough:

The Agency has received your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 and 40 CFR 152.46, dated April 7, 2010, for the product IMI Tech, EPA Reg. No. 53883-214. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and 40 CFR 152.46 and finds that the action requested does not clearly fall within the scope of PR Notices 98-10 and 40 CFR 152.46 and will require additional administrative review of the related files. A summary of our findings include:

- The new active ingredient referenced [REDACTED], does not match the active ingredient currently being used by the registrant.

Therefore, RD has determined that these actions are denied and the label submitted with the application has been forwarded to Venus Eagle, PM 01 for further processing as an amendment. If you have any questions, please call me directly at (703) 308-8043 or email lewis.marianne@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Marianne Lewis".

Marianne Lewis
Insecticide-Rodenticide Branch
Registration Division (7505P)

Product ingredient source information may be entitled to confidential treatment

April 7, 2010

Linda Arrington, Team Leader, Notifications & Minor Formulation
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Document Processing Desk (NOTIF)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Subject: Notification per PR Notice 98-10 to update the IMI Tech
EPA Registration No. 53883-214

Dear Ms. Arrington:

Control Solutions Inc. (CSI, EPA Company Number 53883-) is submitting a notification per PR Notice 98-10 to make revisions to the Confidential Statement of Formula (CSF) for IMI Tech. The following items are enclosed in support of this notification:

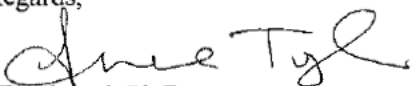
- (1) Application for Pesticide Form (8570-1)
- (2) Revised Confidential Statement of Formula (two copies)
- (3) Formulator's Exemption Statement Form (8570-27)

CSI has been informed that [REDACTED] intends to transition supply of the current Imidacloprid 99% active [REDACTED] to [REDACTED]. The new source of Imidacloprid indicated on the CSF is an EPA registered source. No other changes to the CSF have been made.

"This notification is consistent with provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

If you have any questions or need additional information, please do not hesitate to contact me at 281-892-2532.

Best Regards,


Anne Turnbough Ph.D.
Manager, Regulatory Affairs



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 53883 - 214	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IMI Tech	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507-1041 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

The revisions to the CSF consist of updating the list of alternate suppliers for the active ingredient Imidacloprid. An alternative CSF has been submitted to reflect change in supplier. Each of the new sources of Imidacloprid indicated on the CSF are EPA registered sources. No other changes to the CSF have been made.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container		<input checked="" type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Nat Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 55 kg		5. Location of Label Directions <input checked="" type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Anne Turnbough		Title Manager, Regulatory Affairs		Telephone No. (Include Area Code) 800-242-2532	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Manager, Regulatory Affairs			
4. Typed Name Anne Turnbough		5. Date 04-07-10			

Material to be added to an e-Jacket/Jacket

Reg. No. 53883-214

Description: _____

1. ☐ Placement within the e-Jacket/jacket:

- ☐ Default: (chronological, top = newest)
 - ☐ File Location: (PDF page number, i.e., "before page 45")
- _____
- _____

2. ☐ Send to Data Extraction contractors this material:

- ☐ Newly stamped accepted label
- ☒ Notification
- ☐ New CSF
- ☐ Other: _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: Sami Samir

Phone: 703 305-5409 Division: ESD

Date: 04/22/2010



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

APR 22 2010

Ms. Amy Warren
Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

Subject: Revised Disposal Language

Dear Ms Warren:

The Agency is in receipt of your Application(s) for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 dated April 7, 2010 for:

EPA Registration 53883-214

IMI Tech

The Registration Division (RD) has conducted a review of this request for applicability under PRN 2007-4 and finds that the label change(s) requested falls within the scope of PRN-2007-4. The label has been date-stamped "Notification" and will be placed in our records.

If you have any questions, call me at 703 305-5409 or electronically at daniel.dani@epa.gov.

Sincerely,

A handwritten signature, likely of Dani Daniel, consisting of stylized initials and a surname.

Dani Daniel
Registration Division (7504P)
Insecticide/Rodenticide Branch



United States
Environmental Protection Agency
Washington, DC 20460

NOTIFICATION

APR 22 2010

Registration
Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 53883 -214	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IMI Tech	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507-1041 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input checked="" type="checkbox"/> Plastic	
				<input checked="" type="checkbox"/> Glass	
				<input checked="" type="checkbox"/> Paper	
				Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1-50 lb bags		5. Location of Label Directions <input checked="" type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Amy Warren		Title Regulatory Affairs Specialist	
		Telephone No. (Include Area Code) 800-242-5562	
<p align="center">Certification</p> <p>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.</p>			
2. Signature 		3. Title Regulatory Affairs Specialist	
4. Typed Name Amy Warren		5. Date 4-7-10	
6. Date Application Received (Stamped)			

CSI
CONTROL
SOLUTIONS
i n c o r p o r a t e d

April 7, 2010

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

**Re: Notification per (PR) Notice 2007-4, Labeling Revisions required by the Final Rule
"Pesticide Management and Disposal"
(EPA Reg. No. 53883-214) IMI Tech**

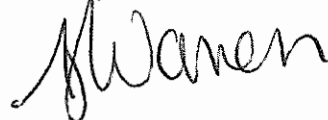
Dear Sir or Madam:

Enclosed is a Notification for (PR) 2007-4; See highlighted text on attached labeling.

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions or need additional information, please feel free to contact me.

Sincerely,



Amy Warren
Regulatory Affairs Specialist
Control Solutions, Inc.

Control Solutions, Inc.
5903 Genoa Red Bluff • Pasadena, TX 77507-1041 • www.controlsolutionsinc.com
281-892-2500 • Fax 281-892-2501 • 800-242-5562

NOTIFICATION

APR 22 2010

IMI Tech [Alt. Name: Dominion Tech]

For Use in the Manufacture of Insecticides

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine99.0%

OTHER INGREDIENTS:1.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN WARNING

FIRST AID	
If swallowed:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If inhaled:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.• Call a poison control center or doctor for further treatment advice.
If on skin or clothing:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If in eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall® International (866) 897-8050 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat symptomatically.	

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS WARNING

May be fatal if swallowed. Harmful if inhaled. Causes moderate eye irritation. Avoid breathing dust or vapor. Avoid contact with skin, eyes and clothing. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

EPA Reg. No. 53883- 214

EPA Est. No. 53883-TX-02

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

Net Weight: _____

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

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Terrestrial Food Crop: Apple, Barley, Bushberry, Canola, Citrus, Cotton, Cranberry, Cucurbit Vegetables, Grape, Greenhouse Vegetables, Fruiting Vegetables, Head and Stem Brassica Vegetables, Leafy Vegetables, Leafy Petiole Vegetables, Legume Vegetables, Hop, Pecan, Pome Fruit, Potato, Root Vegetables, edible seed crops for Sorghum, Sugar beet, Strawberry, Stone Fruit, Tropical Fruit, Tuberous and Corm Vegetables, and Wheat.

Greenhouse Non-Food Crop or Residential and Commercial Indoor: Ornamentals.

Each formulator is responsible for obtaining EPA registration for their end-use product(s).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Completely empty bag into manufacturing equipment. Offer for recycling if available. Do not rinse unless required for recycling. If recycling is not available, then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

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Control Solutions, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Control Solutions, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, CONTROL SOLUTIONS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF

It is Control Solutions, Inc.'s and seller's intention that to the extent consistent with applicable law, Control Solutions, Inc. or the Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF CONTROL SOLUTIONS, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF CONTROL SOLUTIONS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

A collection of 20 small, stylized line drawings of various insects, including beetles, flies, and bees, arranged in a grid-like fashion. The drawings are simple and illustrative, showing the basic shapes and features of each insect.



6642
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

NOTIFICATION

APR 20 2007

APR 20 2007

Joe Blake
Director, Regulatory Affairs
Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

SUBJECT: Application for Pesticide Notification – Request of Alternate Brand Name
IMI Tech
EPA Reg. No. 53883-214
Application Dated March 30, 2007

Dear Mr. Blake:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

A handwritten signature in black ink, appearing to be "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 53883 -214	2. EPA Product Manager George LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IMI Tech	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507-1041 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

NOTIFICATION**APR 20 2007****Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification of Alternate Brand Name per PR Notice 98-10. This product will also be sold as Dominion Tech. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 USC Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.5 gallon		5. Location of Label Directions <input type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Joe Blake		Title Director, Regulatory Affairs		Telephone No. (Include Area Code) 800-242-5562	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Director, Regulatory Affairs			
4. Typed Name Joe Blake		5. Date 03-30-07			

IMI Tech
[Alt. Name: Dominion Tech]
For Use in the Manufacture of Insecticides

NOTIFICATION

APR 20 2007

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine99.0%

OTHER INGREDIENTS:1.0%

TOTAL:100.0%

KEEP OUT OF REACH OF CHILDREN
WARNING

FIRST AID	
If swallowed:	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If inhaled:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.• Call a poison control center or doctor for further treatment advice.
If on skin or clothing:	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If in eyes:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall® International (866) 897-8050 for emergency medical treatment information.	
NOTE TO PHYSICIAN	
No specific antidote is available. Treat symptomatically.	

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
WARNING

May be fatal if swallowed. Harmful if inhaled. Causes moderate eye irritation. Avoid breathing dust or vapor. Avoid contact with skin, eyes and clothing. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

EPA Reg. No. 53883- 214

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

EPA Est. No. 53883-TX-02

Net Weight: _____

ENVIRONMENTAL HAZARDS

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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Greenhouse Non-Food Crop or Residential and Commercial Indoor: Ornamentals.

Each formulator is responsible for obtaining EPA registration for their end-use product(s).

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in a cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food, and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Completely empty bag into manufacturing equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

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Control Solutions, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Control Solutions, Inc., and

Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, CONTROL SOLUTIONS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

It is Control Solutions, Inc.'s and seller's intention that to the extent consistent with applicable law, Control Solutions, Inc. or the Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF CONTROL SOLUTIONS, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF CONTROL SOLUTIONS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Control Solutions, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Control Solutions, Inc.

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U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (H7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg.
Number:

53883-214

Date of Issuance:

Term of Issuance: **Conditional**

Name of Pesticide Product:

IMI Tech

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Mr. Joe Blake
Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A). Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3)(c)(2)(B).

1. Revise the EPA Registration Number to read, EPA Reg. No. "53883-214".

Signature of Approving Official:

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division (7505P)

Date:

FEB - 8 2007

2. Make the following changes to the warranty statement:

-Change the word "**should**" to the word "**must**" in the second paragraph of the warranty statement.

-Add the following statement "**To the extent consistent with applicable law**" at the beginning of the last sentence of the third paragraph.

-In paragraph four rewrite "**to the extent allowable under State law**" to read as "**To the extent consistent with applicable law**".

A stamped copy of the label is enclosed for your records. If you have any questions regarding this notice, please contact me at (703) 305-5409.

Enclosure:

FEB - 8 2007

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

53883-214

IMI Tech

For Use in the Manufacture of Insecticides

ACTIVE INGREDIENT:

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine99.0%

OTHER INGREDIENTS:1.0%

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KEEP OUT OF REACH OF CHILDREN WARNING

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EPA Reg. No. 53883-

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

EPA Est. No.

Net Weight: _____

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United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 53883 - <i>ERK</i>	2. EPA Product Manager <i>George LaRocca</i>	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) IMI Tech	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507-1041 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. XXXXXXXXXX Product Name XXXXXXXXXX	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Application for me-too registration
Fee Category: R30
Fee: 1050.00

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input checked="" type="checkbox"/> Plastic	
If "Yes" Unit Packaging wgt. No. per container		If "Yes" Package wgt. No. per container		<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 55 kg		5. Location of Label Directions <input checked="" type="checkbox"/> on label	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Joe Blake		Title Director, Regulatory Affairs		Telephone No. (Include Area Code) 800-242-5562	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature <i>[Signature]</i>		3. Title Director, Regulatory Affairs			
4. Typed Name Joe Blake		5. Date 10-20-06			

CSI
CONTROL
SOLUTIONS
incorporated

Product ingredient source information may be entitled to confidential treatment

October 20, 2006

Document Processing Desk (APPL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
One Potomac Yard
277 S. Crystal Drive
Arlington, VA 22202

Attn: Mr. George LaRocca
Product Manager (13)

RE: **APPLICATION FOR RE-PACK REGISTRATION OF:**
IMI Tech

Dear Mr. LaRocca:

We are hereby applying for registration of the above referenced pesticide product. This submission is being made in accordance with the Expedited review Procedures of FIFRA Section 3(c)(3)(B)(I). The proposed registration is identical to the registered product [REDACTED]

As IMI Tech will be a straight re-pack of [REDACTED], we have not included a "Certification with Respect to Citation of Data" Form nor a Data requirements (matrix) list. These items have not been included with this submission as FIFRA 3(c)(3)(D) states:

"No applicant for registration of a pesticide who proposes to purchase a registered pesticide from another producer in order to formulate such purchased pesticide into the pesticide that is the subject of the application shall be required to - (i) submit or cite data pertaining to such purchased product."

In addition, 40 CFR 158.50 provides:

(A) FIFRA Section 3(c)(2)(D) provides that an applicant for registration of an end-use pesticide product need not submit or cite any data that pertain to the safety of another registered pesticide product which is purchased by the applicant and used in the manufacture or formulation of the product for which registration is sought. (c) This exemption does not apply to data concerning safety of the applicant's end-use product itself, unless the composition of the applicant's product and that of the purchased product is identical, i.e. data which this part indicates must be developed by tests using the end-use product for which the registration is sought as the test substance.

Included with this registration package, please find the following items:

1. Application for Pesticide Registration (EPA Form 8570-1)
2. Formulator's Exemption Statement (EPA form 8570-27)

October 20, 2006

3. Confidential Statement of Formula (EPA Form 8570-4)
4. Five copies of Proposed Draft Product Labeling



Should you have any questions or need additional information for this submission, please do not hesitate to contact us at the address or phone/fax numbers above or at the e-mail address below.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joe Blake'. The signature is fluid and cursive, with a large loop at the end.

Joe Blake
Director, Regulatory Affairs



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address

Control Solutions, Inc.
5903 Genoa-Red Bluff
Pasadena, TX 77507-1041

EPA File Symbol/Registration Number

53883 -

Product Name

IMI Tech

Date of Confidential Statement of Formula (EPA Form 8570-4)

10-20-06

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Imidacloprid

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:


☒ **(A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).**

OR

☐ **(B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.**

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Imidacloprid		
Signature 	Name and Title Joe Blake - Director, Regulatory Affairs	Date 10-20-06

